

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

In Re Innovatio IP Ventures, LLC, Patent Litigation	Case No. 1:11-cv-09308
This Document Relates To:	Judge James F. Holderman Magistrate Judge Sidney Schenkier
All Cases	

**PARTIES' AGENDA FOR THE MARCH 24, 2015
STATUS CONFERENCE BEFORE JUDGE HOLDERMAN**

In preparation for the upcoming March 24, 2015 status conference before Judge Holderman in the above-captioned matter, Innovatio IP Ventures, LLC ("Innovatio") and Texas Instruments Inc. ("TI") jointly submit the following agenda:

Innovatio and TI are continuing to complete discovery on the narrowed topics previously identified by the parties. Innovatio has also served several subpoenas on third-party customers of TI requesting, among other things, information related to the identity and number of products imported into the United States that contain a TI Wi-Fi chip.

Innovatio also recently filed three additional lawsuits against three chip manufacturers in this District (collectively, the "New Chip Manufacturers"): Marvell Semiconductor, Inc. (15-cv-2259; St. Eve, J.); MediaTek USA Inc. (15-cv-02262; Blakey, J.); and Realtek Semiconductor Corporation (15-cv-2269; Gottschall, J.). On March 18, 2015, Innovatio filed a "Notice of Earlier Order in Related Case" in each of the new lawsuits, advising the newly-assigned judges and providing a copy of Judge Holderman's January 10, 2012 Order in this Master Consolidated Case 11-cv-09308. (See Dkt. No. 8, Case No. 15-cv-2259; Dkt. No. 7, Case No. 15-cv-2262; Dkt. No. 8, Case No. 15-cv-2269.) On March 19, 2015, the Executive Committee ordered that

the three new cases be reassigned to Judge Holderman and Magistrate Judge Schenkier. (*See* Dkt. No. 9, Case No. 15-cv-2259; Dkt. No. 9, Case No. 15-cv-2262; Dkt. No. 9, Case No. 15-cv-2269.)

On March 20, 2015, this Court asked Innovatio's counsel to contact defense counsel for the three new defendants to apprise them of the March 24, 2015 status hearing and request that such defense counsel appear on behalf of their clients at the March 24 hearing. (Dkt. No. 1175, Case No. 11-cv-09308.) On March 20, Innovatio's counsel reached out to counsel for Marvell, MediaTek, and Realtek and provided them with a copy of the Court's March 20 Order. The afternoon of March 20, Innovatio's counsel received a reply from Realtek's licensing counsel advising that, at this point in time, he has not been retained to serve as Realtek's litigation counsel. Innovatio's counsel replied to that email, asking Realtek's licensing counsel to please forward the Court's March 20 Order to an appropriate contact at Realtek.

Once the three new defendants answer Innovatio's complaints, Innovatio suggests that the parties agree to a limited, initial discovery period – similar to the one agreed to by Innovatio and TI – in hopes of taking some basic discovery that will assist the parties in having meaningful settlement discussions. This will also streamline any potential summary judgment motions, and help minimize any burden to the third-party customers previously subpoenaed, which may also sell products that contain chips manufactured or sold by the three new defendants, and can respond to Innovatio's subpoenas with respect to all defendants at one time.

In view of this suggestion, Innovatio proposes that, within one week of the three new defendants answering Innovatio's complaint, the parties may serve discovery directed to the topics outlined in the Court's prior order of September 18, 2014 (Dkt. No. 1164). Innovatio further proposes that the parties also work to respond to certain basic requests (including the

identity of Wi-Fi chips and main customers) on an expedited basis. Finally, Innovatio proposes that the parties make best efforts to complete this discovery by May 29, 2015.

Respectfully submitted,

Dated: March 21, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2015 a true and correct copy of the foregoing **PARTIES' AGENDA FOR THE MARCH 24, 2015 STATUS CONFERENCE BEFORE JUDGE HOLDERMAN** was electronically filed with the Court via the CM/ECF system, which sent notification of such filing to all Counsel of Record.

/s/ Matthew G. McAndrews

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